

Joyce W. Lindauer
State Bar No. 21555700
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
Dallas, Texas 75202
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: §
§
2M RESEARCH SERVICES LLC and § **CASE NO. 23-40271-11**
MARCUS E. MARTIN, § **Chapter 11**
§
§
Debtors. §

**POST-CONFIRMATION MODIFICATION TO DEBTORS' FIFTH
AMENDED JOINT PLAN OF REORGANIZATION [Docket No. 257]**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW 2M Research Services LLC and Marcus E. Martin, the debtors herein (“Debtors”), and file this heir Post-Confirmation Modification to the Debtors’ *Fifth Amended Joint Plan of Reorganization* filed on August 28, 2024 [Docket No. 257, the “Plan”]. The Plan provided that the Debtors may modify the Plan at any time after Confirmation, upon compliance with Bankruptcy Code § 1127. The Debtors or their attorney shall provide notice of any such proposed modification to all Creditors and other parties in interest in these Chapter 11 proceedings. If, in the opinion of the Bankruptcy Court, the modification does not materially and adversely affect the interest of the Creditors, the Bankruptcy Court may modify the Plan without notice to Creditors, or may modify the Plan upon notice only to those Creditors that the Bankruptcy Court deems to be materially and adversely affected. Debtors would show as follows:

1. Debtors propose the following Post-Confirmation Modification.

CLAIMS AGAINST 2M RESEARCH SERVICES, LLC

Class 2M 4: Allowed Secured Claim of Texas Workforce Commission.

This Claim shall be paid in full in equal monthly installments of principal with interest thereon at the rate of 9.50% per annum. Payments will commence on the first day of the first month following the Effective Date and continue until the expiration of 60 months from the Petition Date.

Notwithstanding anything in the Plan to the contrary, the Plan shall not release or discharge any entity, other than the Debtors or Reorganized Debtors, from any liability owed to the Texas Workforce Commission for a tax debt, including interest and penalties on such tax. This provision is not an admission by any party that such liability exists.

Notwithstanding anything in the Plan to the contrary, the Plan shall not limit the Texas Workforce Commission's setoff rights under 11 U.S.C. § 553. This provision is not admission by any party that such setoff rights exist.

A failure by the reorganized Debtor to make a payment to the TWC pursuant to the terms of the Plan shall be an Event of Default. If the reorganized Debtor fails to cure an Event of Default as to tax payments within ten (10) calendar days after service of written notice of default from the TWC, the TWC may (a) enforce the entire amount of its claim, (b) exercise all rights and remedies under applicable nonbankruptcy law, and (c) seek such relief as may be appropriate in this Court. Notice of the default shall be served by first class mail upon the reorganized Debtor at: 1305 Grayhawk Drive, Mansfield, Texas 76063, Attn: Chief Executive Officer, and to Debtors' attorney at Joyce W. Lindauer Attorney, PLLC, 1412 Main Street, Suite 500, Dallas, Texas 75202; Attn: Joyce W. Lindauer, Esq.; joyce@joycelindauer.com.

Debtor shall be allowed to cure up to two (2) defaults. Upon a third default, the TWC, at its option, may declare the default non-cureable and proceed to collect the remainder of the debt.

This Claim is Impaired, and the holder of this Claim is entitled to vote to accept or reject the Plan.

Dated: October 18, 2024.

Respectfully submitted,

/s/ Joyce W. Lindauer

Joyce W. Lindauer

State Bar No. 21555700

Joyce W. Lindauer Attorney, PLLC

1412 Main St. Suite 500

Dallas, Texas 75202

Telephone: (972) 503-4033

Facsimile: (972) 503-4034

Attorneys for Debtors

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on October 14, 2024, Sherri Simpson in the Texas Attorney General's Office on behalf of the Texas Workforce Commission reviewed and approved the foregoing Plan Modification.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 18, 2024, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

Roquemore Skierski PLLC

Tarrant County

13155 Noel Rd.

Linebarger, Goggan, Blair & Sampson, LLP

Suite 900

c/o John K. Turner

Dallas, TX 75240-6882

2777 N. Stemmons Freeway

Suite 1000

Dallas, TX 75207-2328

Texas Comptroller of Public Accounts, Revenue

Texas Workforce Commission

Christopher S. Murphy

Christopher J. Dylla

P.O. Box 12548

c/o Sherri K. Simpson, Paralegal

Austin, TX 78711-2548

P.O. Box 12548

Austin, TX 78711-2548

VW Credit, Inc.

501 W. Tenth Street

14841 Dallas Parkway

Fort Worth, TX 76102-3637

Suite 425

Dallas, TX 75254-8067

WELLS FARGO BANK, N.A., AS TRUSTEE FOR HOLDE

c/o Aldridge Pite, LLP

Six Piedmont Center

3525 Piedmont Road, N.E.

Suite 700

Atlanta, GA 30305-1608

2M Research Services 401(k) Profit Sharing P

2M Research Services, LLC Group Health Plan

c/o U.S. Department of Labor, EBSA

c/o U.S. Department of Labor, EBSA

525 S. Griffin Street, Suite 900

525 S. Griffin Street, Suite 900

Dallas, TX 75202-5042

Dallas, TX 75202-5042

Abt Associates

Arlington County Treasurer

c/o Laurie Dahl Rea

2100 Clarendon Blvd, Ste 217

300 Throckmorton Street, Suite 520

2100 Clarendon Blvd, Ste 217

Fort Worth, TX 76102-2929

Arlington, VA 22201-5447

Applied Engineering Management Corporation

c/o Jameson & Dunagan, PC

5429 LBJ Freeway Suite 300

Dallas, Texas 75240-2645

AvidXchange Inc

City Attorney's Office

C/O Mcc Lienmaster

PO Box 90231

23240 Chagrin Blvd 410

Arlington, TX 76004-3231

Beachwood, OH 44122-5415

Chubb National Insurance Company

1702 Townhurst Drive

1702 Townhurst Drive

Houston, TX 77043-2811

Comptroller of the Treasury

Fox Capital Group, Inc.

301 W Preston Street Room #409

c/o Zachter PLLC

Baltimore, MD 21201-2383

2 University Plaza, Suite 205

Hackensack, NJ 07601-6211

(p)GEORGIA DEPARTMENT OF REVENUE

COMPLIANCE DIVISION

ARCS BANKRUPTCY

1800 CENTURY BLVD NE SUITE 9100

ATLANTA GA 30345-3202

Illinois Department of Employment Security

33 S State St

Chicago, IL 60603-2808

Internal Revenue Service

1100 Commerce Street, MS 5027

Dallas Texas 75242.

Attention: Insolvency 75242-1100

JPMorgan Chase Bank, N.A.

s/b/m/t Chase Bank USA, N.A.

c/o Robertson, Anschutz, Schneid,

Crane & Partners, PLLC

6409 Congress Avenue, Suite 100

Boca Raton, FL 33487-2853

James Watson

2718 Olympic Park Dr

Grand Prairie, TX 75050-1322

Joshua Townley

3820 Vitruvian Way

Apt. 143

Addison, TX 75001-4434

Case 23-40271-mxm11

Doc 268 Filed 10/18/24 Entered 10/18/24 16:31:01 Desc

Kowther Elqutob

Lan Hu

Main Document

Page 5 of 6

7844 NW 123 Ave.

1601 Cabot Ct

Pompano Beach, FL 33076-4546

Arlington, TX 76006-6511

Kowther Elqutob
1601 Cabot Cir.
Arlington, TX 76006-6511

Lara Milavickas
921 Riviera Drive
Mansfield, TX 76063-3714

(p) LAURIE DAHL REA
ROCHELLE MCCOLLOUGH LLP
300 THROCKMORTON STREET SUITE 520
FORT WORTH TX 76102-2929

Lazonda Charles
63 Townhouse Ln
Grand Prairie, TX 75052-6220

Madison Davis
3721 West Beverly Drive
Dallas, TX 75209-6209

Marcus Martin
1305 Grayhawk Drive
Mansfield, TX 76063-5555

Maxwell Matite
6133 64th Avenue
Apt. 5
Riverdale, MD 20737-2926

McKing Consulting Corporation
2810 Old Lee Highway
Suite 300
Fairfax, VA 22031-4376

McKing Consulting Corporation
c/o Bean Kinney & Korman, P.C.
Attn: Andrea C. Davison
2311 Wilson Blvd, Suite 500
Arlington, VA 22201-5422

Oluwadamilare Bamgbose
1001 S Center
Apt 2132D
Arlington, TX 76010-2774

On Deck Capital, Inc.
1400 Broadway
New York, NY 10018-5300

Ondeck Capital
1400 Broadway FL 25
New York, NY 10018-5225

Patrick M. Lynch
503 Hwy 2W
Devils Lake, ND 58301

Paul Ruggiere
4308 Winnetka Rd
Corinth, TX 76208-4820

Pragmatic Financial, LLC
2606 Bunker Hill
McKinney, TX 75070-4527

Reserve Funding LLC
15 WEST 47TH STREET
SUITE 704
New York, NY 10036-3371

Small Business Administration
14925 Kingsport Rd.
Fort Worth, TX 76155-2243

State of Maryland Revenue Office, Comptrolle
Revenue Administration Division
10 Carroll Street
Annapolis, MD 21411-0001

Tarrant County
Linebarger Goggan Blair & Sampson, LLP
c/o John Kendrick Turner
2777 N. Stemmons Freeway
Suite 1000
Dallas, TX 75207-2328

Texas Workforce Commission
Office of Attorney General
BK/Collections
P.O. BOX 12548, MC008
Austin, TX 787112548

U.S. Bank, N.A. d/b/a U.S. Bank Equipment Fi
1310 Madrid Street
Marshall, MN 56258-4099

United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242-0996

VW Credit, Inc.
PO Box 9013
Addison, Texas 75001-9013

Vickie Kennard
121 Autumn Trail
Red Oak, TX 75154-4712

Wells Fargo Bank, N.A.
Small Business Lending Division
P.O. Box 29482 MAC S4101-08C
Phoenix, AZ 85038-9482

Western Equipment Finance, Inc.
503 Hwy 2W
Devils Lake, ND 58301

William Vaughen
185 Thomas Burgin Pkwy
Apt 1
Quincy, MA 02169-4203

Areya Aurzada
Holder Law
P.O. Box 2105
Addison, TX 75001-2105

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

GEORGIA DEPARTMENT OF REVENUE
1800 CENTURY BLVD NE
SUITE 9100
Atlanta, GA 30345-3205

Laurie Dahl Rea
Rochelle McCullough, LLP
300 Throckmorton
Suite 520
Fort Worth, TX 76102

Joyce W. Lindauer
Joyce W. Lindauer Attorney, PLLC
1412 Main Street
Suite 500
Dallas, TX 75202

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Abt Associates Inc.

(u) PHH Mortgage Corporation

(u) Small Business Administration

(u) United States Of America Internal Revenue

(d) VW Credit, Inc.
PO Box 9013
Addison, Texas 75001-9013

	End of Label Matrix
Mailable recipients	61
Bypassed recipients	5
Total	66